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March 23, 2022

By ECF

The Honorable Loretta A. Preska
United States District Court Judge
United States District Court for the
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Lynch v. City of New York, et al.; 16 Civ. 7355 (LAP) (BCM)

Dear Judge Preska:

I am counsel for Plaintiff in the above-captioned action. The parties write jointly to respectfully request a referral of this case to the assigned Magistrate Judge for a settlement conference, and a stay of discovery until settlement efforts with the Magistrate Judge's assistance have been exhausted. If settlement efforts with the Magistrate Judge's assistance are unsuccessful, the parties respectfully suggest that they would at that point write the Court to suggest a further schedule for the completion of fact discovery. The current deadline for the completion of fact discovery is March 31, 2022.

The reason for the request is that the parties have exchanged settlement proposals but they remain far apart. All parties feel that the Magistrate Judge's assistance at a settlement conference could be helpful with facilitating their negotiations. The parties would also like to avoid the expenditure of significant additional litigation costs and burdens prior to concluding settlement discussions, as additional expenditures would likely make any potential settlement more difficult to achieve.

SO ORDERED

Loretta A. Preska
LORETTA A. PRESKA
UNITED STATES DISTRICT JUDGE

3/24/22

The parties thank the Court for its consideration in this matter.

Respectfully submitted,

/S/

Jeffrey A. Rothman
Counsel for Plaintiff

/S/

Alan Scheiner
Counsel for Defendants